

FILED

DEC 16 2021

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

)

v.

)

MIKAL KELLER,

) CASE NO.

5 :21 CR 871

Defendant.

)

Title 18, United States Code,
Sections 542, 545, 922(g)(1),
(o)(1), 924(a)(2) and 2

JUDGE CALABRESE

COUNT 1

(Importation of Unregistered Firearm into the United States, 18 U.S.C. § 545)

The Grand Jury charges:

1. From or about August 1, 2021 to on or about September 14, 2021, in the Northern District of Ohio, Eastern Division, Defendant, MIKAL KELLER, fraudulently and knowingly imported or brought into the United States, any merchandise contrary to law, specifically, a Glock auto switch, and received concealed, bought, sold, and in any manner facilitated the transportation and concealment of the merchandise after importation knowing the same to have been imported into the United States contrary to law, in violation of Title 18, United States Code, Section 545.

COUNT 2

(Entry of Goods by Means of False Statements, 18 U.S.C. § 542)

The Grand Jury further charges:

2. From on or about August 1, 2021 to on or about September 14, 2021, in the Northern District of Ohio, Eastern Division, Defendant, MIKAL KELLER, willfully and knowingly entered and introduced, and attempted to enter and introduce, into the commerce of the United States, imported merchandise, specifically a Glock auto switch, by means of a false and fraudulent invoice,

declaration and statement which falsely and fraudulently stated that the package contained "motorcycle parts" in violation of Title 18, United States Code, Section 545.

COUNT 3

(Felon in Possession of Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

3. On or about September 14, 2021, in the Northern District of Ohio, Eastern Division, Defendant MIKAL KELLER, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Burglary, on or about February 28, 2017, in Case Number CR-2016-07-2361, in the Summit County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Glock 19 9mm pistol, bearing serial number BGUM200, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 4

(Attempted Illegal Possession of a Machine Gun, 18 U.S.C. §§ 922(o)(1), 924(a)(2) and 2)

The Grand Jury further charges:

4. On or about August 1, 2021 to on or about September 14, 2021, in the Northern District of Ohio, Eastern Division, Defendant MIKAL KELLER, knowingly attempted to possess a machine gun, to wit: a Glock Auto Switch, in violation of Title 18, United States Code, Sections 922(o)(1), 924(a)(2) and 2.

FORFEITURE

The Grand Jury further charges:

5. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 545 and 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 and 4 are incorporated herein by reference. As a result of the foregoing offenses, Defendant MIKAL KELLER shall forfeit to the United States any merchandise introduced into the United States in violation of Counts 1 and 2; and any and all firearms and ammunition involved in or used in the commission of the violations charged in Counts 3 and 4; including, but not limited to, the following:

- a. a Glock 19 9mm pistol, bearing serial number BGUM200, seized on September 14, 2021;
- b. a Glock Auto Switch, seized on August 1, 2021 to on or about September 14, 2021; and
- c. multiple Glock magazines, seized on August 1, 2021 to on or about September 14, 2021.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.